

ATTACHMENT B

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF MISSOURI
AFFIDAVIT**

I, Cameron Heath, being first duly sworn, do hereby depose and state that:

1. I am employed as a Special Agent with the Federal Bureau of Investigation (FBI). I have been employed as a Special Agent since September 2015. I am currently assigned to the Springfield Resident Agency (RA), Springfield, Missouri. Previously, I was assigned as the FBI Safe Streets Gang Task Force Coordinator for the Wichita RA. Prior to service with the FBI, I was a State Trooper with the Missouri State Highway Patrol. As a Special Agent of the FBI, I am authorized to investigate violations of laws of the United States, and I am a law enforcement officer with authority to execute arrest, search, and seizure warrants under the authority of the United States. I have participated in a wide variety of criminal investigations, to include telephonic threats, bank robbery, commercial robberies, drug and gang crimes, crimes against children, white collar crimes, and other violent and non-violent crimes. Additionally, I have participated in the preparation of many criminal complaints, search warrants and have participated in numerous searches and arrests.
2. This affidavit is made in support of a criminal complaint against, and arrest warrant for, DAVID WILLIAM PLATEK for a violation of Title 18, United States Code, Section 875(c) (Threat by Interstate Communications).
3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not purport to set forth all of my knowledge of or investigation into this matter.

Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

I. STATUTORY BACKGROUND AND PROBABLE CAUSE SUMMARY

4. 18 U.S.C. § 875(c) provides: “Whoever transmits in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another, shall be fined under this title or imprisoned not more than five years, or both.”

5. As indicated below, I believe that there is probable cause that from on or about December 7, 2024, through December 16, 2024, PLATEK, while located in the Western District of Missouri, sent numerous death threats about D.D. (herein the VICTIM), located in the Central District of California, in text messages to an out-of-state third-party recipient, Person 1. Additionally, PLATEK sent a threat by Twitter/X post from the Western District of Missouri to the VICTIM, located in the Central District of California. PLATEK’s threats sent by text message to Person 1 included killing the VICTIM, the VICTIM’s family, and perpetrating mass death events in San Luis Obispo (“SLO”) using explosives.

6. PLATEK threatened to kill the VICTIM in retaliation for the VICTIM’s public position and role in PLATEK’s prior criminal charges. In 2019, a county district attorney’s office in California charged PLATEK with identity theft. The charges were later dismissed. PLATEK blames the VICTIM, a prosecutor in that district attorney’s office, for his underemployment and Google search results related to the charges, and repeatedly threatens to kill the VICTIM, the VICTIM’s family, and commit “atrocities” in the VICTIM’s home area in retaliation.

7. Specifically, on or about December 16, 2024, PLATEK sent the following text message to Person 1 threatening the VICTIM, writing: “The second political assassination of 2024, PLATEK

assassinated [VICTIM] two days before his second act, a large explosion killing 400, mostly children, in San Luis Obispo.”

8. PLATEK also wrote, “I wouldn’t even kill my self [sic]. I’d want the trial. ‘I am the monster [VICTIM] and the broken justice system made me.’”

II. STATEMENT OF PROBABLE CAUSE

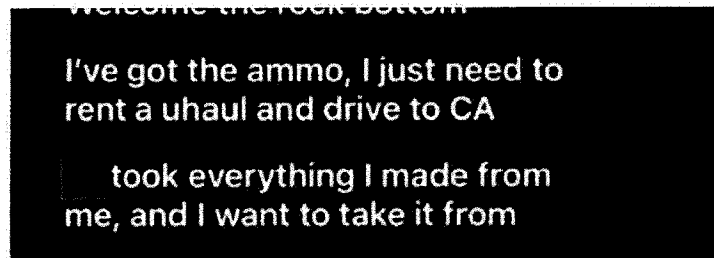
9. Based on my conversations with other law enforcement agents, and my review of law enforcement reports, evidence, and lawfully obtained text messages from PLATEK to Person 1, I am aware of the following:

A. PLATEK Claimed to Have Ammunition and That He Would Drive to California to Kill the VICTIM

10. FBI Special Agent Andrew Harris, in reviewing text messages sent by PLATEK to Person 1, including the screenshots of the Twitter/X repost sent by PLATEK to the VICTIM, discovered the following:

11. On or before December 10, 2024, PLATEK stated he’s been “suicidal for three years and homicidal for one.” PLATEK also said, “I’m becoming worse and more dangerous every day” admitting he nearly shot a random stranger out of anger.

12. As seen in the below screenshot of a text message PLATEK sent to Person 1, on or about December 9, 2024, PLATEK stated he had ammunition, and just needed to drive to California:

A screenshot of a text message on a black background with white text. The text reads: "Welcome the fuck bottom", "I've got the ammo, I just need to", "rent a uhaul and drive to CA", "took everything I made from", "me, and I want to take it from".

Welcome the fuck bottom
I've got the ammo, I just need to
rent a uhaul and drive to CA
took everything I made from
me, and I want to take it from

13. On or about December 9, 2024, PLATEK said he would rent a van to drive to San Luis Obispo and he “has been eyeing the pallet of potassium nitrate” at a nearby farm. On or about December 16, 2024, PLATEK said, “I’ll buy a van. I’ll get a job that gives me access to fertilizer.”

B. PLATEK Vowed to “Go Out Surrounded by the Bodies of [the VICTIM]’s Family on Christmas Day”

14. As reviewed by SA Harris, PLATEK also texted “I’ll do [sic] out surrounded by the bodies of the [VICTIM’S] family on a Christmas day.”

15. On or about December 10, 2024, PLATEK wrote he would host a website “killing[VICTIM].com” and “killing[VICTIM].se” offshore “where the feds can’t touch.”

16. On or about December 10, 2024, PLATEK wrote “I want so badly to choke the life out of [VICTIM], it [sic] instead I’ll donate 6 organs to people desperate need.”

17. On or about December 10, 2024, PLATEK texted Person 1, “I’m inclined to murder [VICTIM’S] family in front of [him/her] because I am capable of such heinous vengeance, but concede no one has the stomach for that appropriate punishment reserved for power made tyrants.”

18. On or about December 11, 2024, PLATEK said “I have one months [sic] rent left and that’s enough to get me to SLO in a rented van.”

19. On or about December 16, 2024, PLATEK said he would let VICTIM’s children live, but they would have to live with the guilt of watching their classmates die.

20. PLATEK texted Person 1 that he “didn’t make any legally identifiable threats,” towards the VICTIM but also said he will scrub his devices, he knows he could end up in prison, and wanted to be remembered as a killer.

C. PLATEK Also Threatened VICTIM Over Twitter/X

21. On or about December 11, 2024, PLATEK texted a screenshot of a threat he made to the VICTIM to Person 1. PLATEK reposted the VICTIM’s months-old post about the Second

Amendment. When PLATEK reposted the VICTIM's post, PLATEK changed his profile picture to Luigi, a Mario Brothers character, referencing the infamous murder suspect Luigi Mangione, who PLATEK refers to as "saint luigi."

22. On or about December 11, 2024, PLATEK texted Person 1: "I could kill another healthcare CEO wearing a tshirt [sic] that says 'it's a mee Mario' and spend the rest of my life reading in a prison cell."

23. PLATEK also sent Person 1 the following text message: "I'll pin [via Twitter/X] [VICTIM'S] 'if you can't get justice use the second amendment' tweet at the top of everything I do that hurts people [he/she] knows."

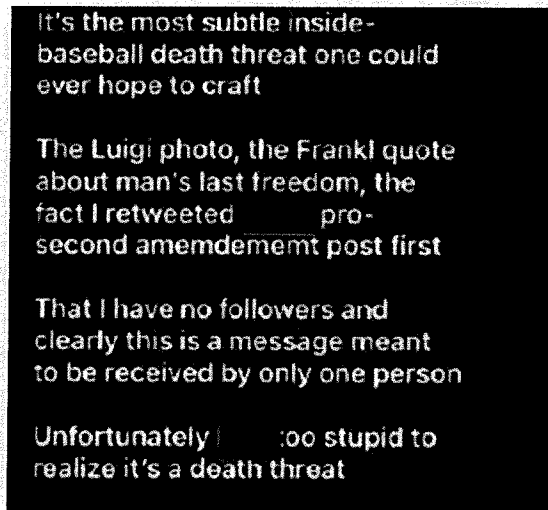
24. On or about December 11, 2024, PLATEK texted Person 1: "I wonder if [VICTIM's] heart will skip a beat when [he/she] sees this." PLATEK said he could imagine the VICTIM calling "an emergency meeting" where the VICTIM "announces to [his/her] staff 'there has been a thread [sic] made against my life, we need to get a warrant for David Platek.'" PLATEK also explained that since he has no followers, and he does not follow other accounts, "no one is ever going to see [the threat] except [VICTIM]. I have no followers. And I hope [VICTIM] is left believing I have no other options either."

Plus, no one is ever going to see
this except I have no
followers

And I hope is left
believing I have no other options
either

I already asked the media to do
something

25. PLATEK described the Luigi reference as: “the most subtle inside-baseball death threat one could ever hope to craft. The Luigi photo, the Frankl quote about man’s last freedom, the fact I retweeted [VICTIM]’s pro second amendment post first That I have no followers and clearly this is a message meant to be received by only one person.” PLATEK went on to explain: “Unfortunately [he/she]’s too stupid to realize it’s a death threat.”



It's the most subtle inside-baseball death threat one could ever hope to craft

The Luigi photo, the Frankl quote about man's last freedom, the fact I retweeted pro-second amemdement post first

That I have no followers and clearly this is a message meant to be received by only one person

Unfortunately I too stupid to realize it's a death threat

26. On or about December 11, 2024, PLATEK texted Person 1 that he wasn’t sure if the VICTIM understood PLATEK’s retweet but “if [he/she] did, [he/she] thinks I know where [he/she] lives now, so it was worth it.”

C. PLATEK Threatened a Mass Casualty Event in San Luis Obispo by Use of Explosives That “Will Scar History Books”

27. In addition to PLATEK’s death threats against the VICTIM, PLATEK texted Person 1 threats that he would commit a mass casualty event, such as shooting up a school or a suicide bombing, in retaliation for the VICTIM’s role in PLATEK’s 2019 criminal charges. In a text message sent to Person 1 on or about December 9, 2024, PLATEK likened himself to the Uvalde

shooter.¹ PLATEK wrote: “The press woulda [sic] gone apeshit if it came out that the Uvalde shooter was a perfectly normal person until an elected official schemed to run his him [sic].”

28. On or about December 9, 2024, PLATEK wrote, “I suddenly understand the mind of the worst people: they go into those schools because they know it will leave a permanent hole in people. It’s making way to [sic] much sense to me.”

29. On or about December 11, 2024, PLATEK texted Person 1, “Am I crazy and likely going to die a violent self-inflicted death, yes, but that will be hilarious too.”

30. On or about December 11, 2024, PLATEK said “The village doesn’t want people like me in it, so I’ll burn it down to stay warm.” PLATEK said: “I am not a coward and I won’t go quietly.” PLATEK then went on to say: “I can’t trust myself because I’ve rationalized ‘violence is acceptable, hurting people is justified.’”

31. On or about December 16, 2024, PLATEK threatened to commit a suicide mission. PLATEK texted Person 1: “Nah, I’m back to my preferred answer. The amount of effort I’m asked to expel to restore my life is a lot less than packing a van full of explosives.” PLATEK said “It would be a lot easier to blow up a building.” Finally, PLATEK said “I’d rather be remembered as a killer. I was a decent person before [the VICTIM], and I don’t care how I’m remembered for two weeks before I’m forgotten forever.”

¹ Based on my training, experience, and open-research, I know that on May 24, 2022, a man committed a mass shooting of Robb Elementary School in Uvalde, Texas, killing dozens of people.

Nah, I'm back to my preferred answer. The amount of effort I'm asked to expel to restore my life is a lot less than packing a van full of explosives

Err, more. It would be a lot easier to blow up a building

Even the fact that this is what I've been reduced to, it's humiliating

I'd rather be remembered as a killer

32. On or about December 16, 2024, PLATEK wrote: "I'll carve my name into the epigenetic history. Fly a plane into a building. Blow up a private catholic school." PLATEK also said: "It'll be easier for me to blow up a school. The options are 'restore my career' or 'most horrible act of terrorism in American history.'"

33. On or about December 16, 2024, PLATEK wrote: "Be afraid. I have no hope and I will hurt anyone I can get my hands on." PLATEK also told Person 1, "My revenge will scar history books."

34. On or about December 16, 2024, PLATEK told Person 1, "Everything I'm told says killing kids is the most pain I can inflict, and I have the right to fight back against the people who did this to me. A primal right."

35. On or about December 16, 2024, PLATEK texted Person 1, as follows: "Bullets are cheap and children are plentiful." PLATEK also texted: "SLO wants to destroy my life, I'll blow up one of their schools."

36. On or about December 16, 2024, PLATEK said: "On January 1 I will shift all of my focus to killing as many people as possible in my lifetime."

**D. PLATEK's Text Messages and Twitter/X Posts are Interstate Communications
which Originated in the Western District of Missouri**

37. During this investigation, SA Harris interviewed Person 1. Additionally, I reviewed utility records and public records, pertaining to PLATEK. Person 1 identified the phone number which PLATEK used to send the texts and messages contained in this affidavit, and the utility records and public records indicate that PLATEK is the registered subscriber of the phone number that sent the above referenced text messages to Person 1. I also know from Springfield FBI's review of public records and utility records that PLATEK resided in Springfield, Greene County, Missouri, during the time that he sent the above referenced threatening text messages.

38. From SA Harris' review of cell records obtained by San Luis Obispo County for PLATEK's phone number, I know that the phone used to send the above-mentioned text messages was in the Western District of Missouri when PLATEK sent the messages. Cell site records obtained on PLATEK's phone number indicate the location of the phone during the times the threats were made as being in Greene County, in the Western District of Missouri. Person 1 confirmed that Person 1 was outside the state of Missouri when Person 1 received PLATEK's text messages discussed above. PLATEK's post on Twitter/X to the VICTIM, who resides in the Central District of California, was sent from Western District of Missouri. Accordingly, all PLATEK's text messages were interstate communications, and PLATEK's Twitter/X post was also an interstate communication over the internet.

39. On December 23, 2024, the Honorable Pedro V. Castillo, United States Magistrate Judge for the Central District of California, authorized a criminal complaint and arrest warrant for PLATEK in Case No 2:24-mj-07536-DUTY. On January 2, 2025, PLATEK was arrested in Springfield, Missouri. When arrested, PLATEK had the cell phone which had been used to make the threatening communication on his person. SA Harris conducted a review of PLATEK's cell

phone after the execution of a federal search warrant. SA Harris discovered on PLATEK's cell phone the December 11, 2024, threatening communication made to the VICTIM.

40. When arrested, PLATEK's arrest while in transport to the Greene County Missouri Jail (GCJ), said without solicitation, to the federal agents present that he knew what this was about, and that the agents could Google his name and there would be an article on the San Luis Obispo government website, and then mentioned the VICTIM by name.

41. On December 30, 2024, law enforcement had surveilled PLATEK a few days before his arrest at his residence in Springfield, Missouri, to confirm his address and saw PLATEK take the side stairs to enter the second story door on the east side of the residence located in Springfield. I reviewed a utilities inquiry that showed PLATEK paid utilities at the residence.

42. On January 28, 2025, a federal grand jury in the Central District of California indicted PLATEK in a one count indictment charging a violation of Title 18, United States Code, Section 875(c) for the December 11, 2024, communication. The case is currently set for trial in the Central District of California in June of 2025. The Central District of California, however, cannot charge the additional threatening communications made by PLATEK to Person 1, therefore the Western District of Missouri is filing this complaint in preparation to more fully account for PLATEK's conduct for the entirety of his actions in the Western District of Missouri. If the Court signs the complaint documents, it is the intent of the Central District of California to dismiss the indictment pending currently against PLATEK.

III. CONCLUSION

43. Based on the facts set forth above and my training and experience, I believe that probable cause exists to believe that DAVID WILLIAM PLATEK has committed a violation of Title 18, United States Code, Section 875(c) (Threat by Interstate Communications).

44. Further your affiant sayeth naught.



Cameron Heath
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me by telephone or other reliable electronic means on
this 1st day of May 2025.



HONORABLE DAVID P. RUSH
United States Magistrate Judge
Western District of Missouri